

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re)	
)	Case No. <u>13-32107-elp7</u>
JESSICA P. SAM)	
HA TO HA)	TRUSTEE'S RESPONSE TO DEBTORS'
)	RESPONSE TO THE TRUSTEE'S
)	OBJECTION TO CLAIMED EXEMPTIONS
)	
<u>Debtor(s)</u>)	

The Trustee responds to the Response filed by the debtors [Dkt #27] to the Trustee's Objection to Claimed Exemption [Dkt #18] as follows. The court is scheduled to consider this objection at a hearing set for July 10th at 11:00 am. The Trustee is also scheduled to appear before Judge Brown at that same time. This Response is intended to expedite the court's review of this matter. The Trustee would request that this matter be set last on this court's 11:00 am docket. The Trustee will separately ask Judge Brown to move the matter pending before her court to the beginning of the docket.

ARGUMENT

The Trustee has corresponded with the debtor and received additional information from the debtor since the Response was filed. Based upon that exchange, the Trustee is prepared to allow the following values and exemptions:

Bank Funds: The amount on hand on the date of filing would be \$567. The amount entitled to exemption would be \$426.

Cash on Hand: The amount on hand on the date of filing would be \$194. The amount entitled to exemption would be \$194.

1998 Lexus: The value of the vehicle would be set at \$5,500. The amount entitled

to exemption would be \$5,500.

1985 Dodge Van: The value of the vehicle would be set at \$500. The amount entitled to exemption would be none. The debtors have used all of their allowable vehicle exemption on the Lexus.

2011 Van: Although the Van has been repossessed, the debtor is not entitled to exempt any funds that may be realized once it is liquidated. That said, no monies are expected to be payable to the bankruptcy estate over and above the sums paid to the lienholder thereon upon liquidation.

CONCLUSION

The Trustee requests that the Court enter an Order setting forth the value of the assets, and the amount entitled to exemption, as set forth above.

Respectfully submitted,

/s/ Kenneth S. Eiler
Chapter 7 Trustee

CERTIFICATE OF SERVICE

I certify that on June 27, 2013 I mailed a true copy of the Trustee's Response set out above to the parties at the addresses below:

Jessic P. Sam
Ha To Ha
8230 SE Yamhill St.
Portland, OR. 97216

UST by email only

/s/ Kenneth S. Eiler
Chapter 7 Trustee